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September 21, 2012

VIA EMAIL AND MAIL

June C. Adams, Esquire
City of Detroit Law Department
660 Woodward, Suite 1650
Detroit, Michigan 48226

Re: Turner v. City of Detroit
Case No.: 2:11-cv-12961

Dear Attorney Adams,

Enclosed please find Plaintiff's Third Notice of Taking Deposition Duces Tecum and Proof of Service in the above-mentioned matter.

If you have any questions, please feel free to contact me as provided above.

Respectfully submitted,

I.A.B. Attorneys At Law, PLLC

By: Felicia Duncan Brock
Felicia Duncan Brock

Enclosure

cc: Alice B. Jennings, Esquire

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

PAMELA WILLIS TURNER

Plaintiff,

v.

CITY OF DETROIT

Defendant.

Honorable: Julian Abele Cook, Jr.

Case No.: 2:11-cv-12961

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Felicia Duncan Brock (P63352)
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PLAINTIFF'S THIRD NOTICE OF TAKING DEPOSITION DUCES TECUM

To: June Adams, Esq.
Bienenstock Court Reporting

PLEASE TAKE NOTICE THAT, pursuant to Federal Rule of Civil Procedure 45, and Magistrate Judge Mark A. Randon's September 13, 2012 Order Granting Motion to Compel, Plaintiff, Pamela W. Turner, by her counselors, Edwards & Jennings, P.C., by Alice B. Jennings, and I.A.B. Attorneys at Law, PLLC, by Felicia Duncan Brock shall take the deposition of **MAYOR DAVE BING** on Friday, September 28, 2012 beginning at 10:00 a.m., at the law

offices of Edwards & Jennings, P.C., 65 Cadillac Square, Cadillac Tower Building, Suite 2710, Detroit, Michigan 48226.

The deposition shall continue from day to day until concluded, within the parameters of Rule 30, and Judge Randon's September 13, 2012 Order, and shall be recorded by stenographic means.

THE DEPONENT IS DIRECTED TO PRODUCE THE FOLLOWING DOCUMENTS:

1. Defendant City of Detroit's Answer to Plaintiff's First Set of Interrogatories to Mayor Dave Bing Pursuant to Court Order Dated April 6, 2012 [Docket No. 25] and Proof of Service served June 7, 2012.
2. Any and all documents used and/or referenced in answering Plaintiff's First Set of Interrogatories to Mayor Dave Bing Pursuant to Court Order Dated April 6, 2012 [Docket No. 25].
3. Any and all of Defendant, City of Detroit's documents regarding Plaintiff's appointment by Mayor Dave Bing as Director of the Water and Sewerage Department.
4. Any and all Defendant, City of Detroit's documents showing salary payments of former Director of the City of Detroit, Water and Sewerage Department, Victor Mercado, from his date of hire until his last day of work.
5. Any and all of Defendant, City of Detroit's documents showing salary payments of former Director of the City of Detroit, Water and Sewerage Department, Anthony Adams, from his date of hire until his last day of work.
6. Any and all Defendant, City of Detroit's documents regarding its hiring of contractor(s) to search for a Director of the City of Detroit's Water and Sewerage Department from January 1, 2001 until present.

7. Any and all handwritten or computer generated notes, summarizing your discussions with Plaintiff, Pamela Turner regarding her pay as the Director of Defendant, City of Detroit's Water and Sewerage Department.

8. Any and all documents of Defendant, City of Detroit detailing or administering discipline, if any, received by Plaintiff, Pamela Turner from her time of hire until her last day of work.

9. Defendant's white book for Director of the Water and Sewerage Department from January 1, 2001 to present.

10. Any and all of Defendant's selection documents, emails, offers and salary contracts for the appointment of Sue McCormick for the position of Director of the City of Detroit, Water and Sewerage Department.

11. Any and all posting or advertisements for the position of the Defendant, City of Detroit, Water and Sewerage Department.

Respectfully,

I.A.B. ATTORNEYS AT LAW, PLLC

By: Felicia Duncan Brock

Felicia Duncan Brock
Attorney for Plaintiff
25447 Plymouth Rd.
Redford, Michigan 48239
(313) 318-3180
Duncan@iabattorneys.com

Dated: September 21, 2012

CERTIFICATE OF SERVICE

I, certify that a copy of Plaintiff's Third Notice of Taking Deposition Duces Tecum was served upon the attorneys of record of all parties to the above cause via e-mail and first class mail on September 21, 2012.

Felicia Duncan Brock
Felicia Duncan Brock